

Department of Community Planning and Economic Development (CPED)
Demolition of a Historic Resource
BZH-27974

Date: November 19, 2013

Applicant: Ryan Companies US, Inc.

Address of Property: 425 Portland Avenue

Project Name: Demolition of a Historic Resource application to demolish the *Star Tribune* Building

Contact Person and Phone: Richard Collins, 612-492-4355

CPED Staff and Phone: John Smoley, 612-673-2830

Date Application Deemed Complete: October 23, 2013

Appeal Period Expiration: December 2, 2013

End of 60-Day Decision Period: December 22, 2013

End of 120-Day Decision Period: February 20, 2014

Ward: 7

Neighborhood Organization: Downtown East

Proposed Use: Park

BACKGROUND

The applicant seeks to demolish the *Star Tribune* building at 425 Portland Avenue South to construct a park.

The property was previously identified as worthy of an intensive level survey in the 2011 reconnaissance level survey of the city's central core. The site is adjacent to the Hubert H. Humphrey Metrodome, but was not evaluated as part of the 2013 Vikings Stadium Environmental Impact Statement, being just outside of the area of potential effect. An August 2013 environmental site assessment of the area commissioned by Ryan Companies did not evaluate the property's eligibility for local, state, or federal listing in registers of historic places. An October 2013 Alternative Urban Areawide Review (AUAR) of Ryan Companies' proposed development of this block and four adjacent blocks did not evaluate the proposed demolition of the *Star Tribune* building. Under a section titled, "Other Historic Resources" the study noted that the subject property could be considered "stadium related infrastructure" within the meaning of the Minnesota Vikings Stadium Act, since this block and one other were identified as possible locations for a public plaza. The Minnesota Sports Facilities

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Authority purchased the block immediately east of 425 Portland Avenue for a plaza after the expiration of the AUAR objection period. The question of the subject property's eligibility for historic designation/listing and the environmental impact of the proposed demolition remains unanswered.

Other hearings and council actions for this proposal have been completed or will be soon. At their October 31 meeting, the Planning Commission's Committee of the Whole (CoW) reviewed the City's proposed purchase of two blocks of future parkland for consistency with the Comprehensive Plan. One of these blocks is 425 Portland Avenue, the subject property. At their November 14 meeting the CoW will review for consistency with the Comprehensive Plan the capital improvement project and the creation of the development district necessary to fund and complete the project. The City Council previously authorized the submission of grant applications intended to fund environmental remediation that would occur on adjacent blocks that are part of the broader project. At a future date, the City Council will consider the terms of the development agreement for the broader project which includes purchase of this land, the establishment of the development district, and the authorization of the issuance of bonds.

DESCRIPTION

The building at 425 Portland Avenue is a five-story brick and stone building with Art Deco and mid-century modern elements. The structure nearly encompasses the block between Portland Avenue, South 5th Street, South 4th Street, and Park Avenue, with ancillary parking and loading areas flanking the building's northern and eastern sides. Four-story sections facing Portland Avenue and 5th Street employ alternating bands of cream-colored brick and dark brick to distinguish each story from the top floor down to a dark, granite-clad first floor.

A five-story section of the building along Portland Avenue serves a focal point. There, the smooth Indiana limestone face on the fifth floor dips down two floors on the section's outer bays while Minnesota black granite climbs upward along the edges and between the inner bays on the first four floors, creating a clear distinction between this vertically-oriented face and the horizontality of the adjacent four-story segments. The words "Star and Tribune" are carved in high-relief on the windowless fifth floor of this segment, as are six seals representing the dominant industries of the upper Midwest on the stone cladding that extends downward through the third floor. Stainless steel accents and banding sit beside and between the fixed windows on these first four floors. Whereas geometric patterns along the four-story portion run in a horizontal band just below the top of the wall, such patterns on this segment run in vertical bands below windows and above the offset main entrance.

The utilitarian northeastern corner of the building employs dark brick to distinguish the first floor from the cream-colored brick-clad second floor and upper floor additions set back from the street. Long stretches of windowed walls between pedestrian entrances characterize all sides of the building except for the loading area along South 4th Street, where garage doors dominate the first floor on a wall set far back from the street.

PROPOSED CHANGES

The applicant seeks to demolish the *Star Tribune* building at 425 Portland Avenue South to construct a park.

NECESSITY OF DEMOLITION

The Minneapolis Code of Ordinances, Title 23, Heritage Preservation, Chapter 599 Heritage Preservation Regulations states that before approving the demolition of a property determined to be an historic resource, the commission shall make findings that the demolition is necessary to correct an unsafe or dangerous condition on the property, or that there are no reasonable alternatives to the demolition. In determining whether reasonable alternatives exist, the commission shall consider, but not be limited to the significance of the property, the integrity of the property and the economic value or usefulness of the existing structure, including its current use, costs of renovation and feasible alternative uses. The commission may delay a final decision for up to one hundred-eighty (180) days to allow parties interested in preserving the historic resource a reasonable opportunity to act to protect it.

UNSAFE OR DANGEROUS CONDITION

The Applicant does not contend that the demolition of the subject property is necessary to correct an unsafe or dangerous condition, but they have identified significant amounts of asbestos within the building.

REASONABLE ALTERNATIVES TO DEMOLITION

Reasonable alternatives to demolition exist. For example, the status quo could continue. The current occupant could continue to use the building as office space. It should be noted, however, that the current owner and taxpayer, subjects of the property's historical significance, are the Cowles Media Company and the *Star Tribune*. They no longer wish to maintain the building, and they have entered into an agreement to sell the property to the applicant who would demolish the property and redevelop the entire block as a park. The park's proposed size and proximity to the downtown core will make it a major urban open space amenity for not just the neighborhood but all of downtown Minneapolis. Increasing open space, long a goal of downtown residents, will help catalyze further development in the area.

SIGNIFICANCE

The subject property appears to meet two of the seven significance criteria.

Criterion 1. The property is associated with significant events or with periods that exemplify broad patterns of cultural, political, economic or social history.

The property appears significant under criterion 1 due to its association with the *Star Tribune* newspaper.

The subject property was constructed in 1919 and 1920 by the Nonpartisan League: the populist and somewhat socialist agrarian movement that swept the upper Midwest beginning in 1915 and which led to the formation of the Farmer Labor Party. The League, under the auspices of the Northwest Publishing Company, founded the *Minnesota Daily Star* (later named the *Minneapolis Daily Star*): one of Minneapolis' many upstart papers audacious enough to challenge the dominant *Minneapolis Journal* and *Minneapolis Tribune*. The paper quickly faltered, falling into receivership by 1924 at which time it was purchased by A.B. Frizell and John Thompson, who

reversed the papers fortunes, but not to the extent of their predecessor. Following Frizell's death in 1934, the paper was purchased by the Cowles family in 1935. Applying the principles that they used to make the *Des Moines Register and Tribune* so successful, John and Mike (Gardner Jr.) leapfrogged Minneapolis' dominant newspapers, increasing the paper's circulation by over 20% and surpassing the *Tribune* and *Journal* in want ad lineage by the start of 1936. By March of 1936 the *Star* surpassed its competition in evening newspaper circulation. Just over four years after purchasing the *Star*, the Cowles purchased the *Journal* in August 1939. On May 1, 1941 the takeover became complete, with the Cowles' purchase of the *Tribune*.¹

The *Star Tribune* name dates back to only 1987, when the *Star and Tribune* name was merged, five years after those two newspapers were merged. Nomenclature notwithstanding, the newspaper itself is the sum of nearly a century and one half of news media ventures and innovations. The *Star Tribune* traces its roots back to 1867, the year that Minneapolis was incorporated and the year the *Minneapolis Tribune* published its first issue. The *Minneapolis Journal* followed suit in 1878. They emerged as serious, stalwart competitors in the 1880s, when they joined the ranks of only five of sixty-eight newspapers to remain in publication throughout the decade. The city's population more than tripled during this decade, thanks in large part to immigrants. Only three immigrant newspapers managed to survive the decade with the *Journal* and *Tribune*, and the immigrant papers published weekly, not daily, editions. Both papers kept publishing despite debilitating fires to their buildings during the decade as well.²

Other innovations kept these organizations competitive. Both newspapers were quick to subscribe to wire services offered by national news agencies like the Associated Press. The *Journal* created a "Junior Journal" newspaper designed to be used in classrooms around the turn of the century. In 1891 *Tribune* publisher William Murphy donated \$350,000 to establish the University of Minnesota's journalism program. Murphy's brother and partner Frederick used the pages of the *Tribune* to lobby heavily for agricultural diversity from 1921 to 1940, the period during which Minneapolis lost its flour milling crown to Buffalo, New York. The paper's efforts convinced farmers to rely less upon wheat and more upon animals, helping ensure the region could adapt to a post-milling economy. The *Tribune* became the first Minnesota newspaper to install a linotype machine, install a color press, operate its own paper mill, and operate a radio station. Over time the *Tribune* was successful enough to buy out a number of competitors, to include the *Minneapolis Times*, the *Penny Press*, and the *News*. Superlatives aside, these newspapers, separately and together, are highly significant, being Minneapolitans oldest continuous source of news. Other buildings associated with the Star Tribune exist, however, and

¹ City of Minneapolis Building Permit #A14600, 421-429 6th Avenue South; Bradley L. Morrison, *Sunlight on Your Doorstep: The Minneapolis Tribune's First Hundred Years, 1867-1967* (Minneapolis: Ross & Haines, 1966) 55-62; Harold L. Nelson, "A History of the Minneapolis Daily Star" (Thesis, University of Minnesota, Minneapolis, 1950) 70, 79, 166. [NOTE: For simplicity's sake in tracing the lineage of newspapers that instituted minor name changes over time, newspaper names are referred to by their dominant moniker, such as *Star*, *Journal*, and *Tribune*.]

² Frederic J. Johnson, "Minneapolis Newspapers of the 1880s," unpublished manuscript, 28, Minneapolis Collection, Special Collections, Hennepin County Library; "History of the Journal," *Minneapolis Journal*, November 26, 1903, 2-3; Hennepin County Library, "A History of Minneapolis: Newspapers," [www.hclib.org/pub/search/specialcollections/mplshistory/?id=32] Accessed November 6, 2013.

the applicant has indicated that the *Star Tribune* will be vacating this building, currently only half-occupied, in the near future.³

Criterion 2. The property is associated with the lives of significant persons or groups.

The property appears significant under criterion 2 due to its association with the Cowles family.

In 1935, John and Mike (Gardner Jr.) Cowles purchased the *Star*. With their father, they had experienced significant success in bringing news to the people of Des Moines, Iowa. In Minneapolis, John Cowles headed local operations and began expanding the firm's holdings into an empire. Just before the time of its sale in 1998, the Cowles Media Company owned twenty-six magazines and a number of television stations across the nation, with their flagship publication, the *Star Tribune*, the 16th largest daily metropolitan newspaper in the United States.⁴

The Cowles revolutionized how Minneapolitans produced and viewed print media. They believed in impartiality, limiting opinions to the editorial page, and presenting diverse views. They also printed reader's opposing views and they prominently corrected errors. As commonplace as it seems today, these innovations were revolutionary for Minneapolis at that time. News in the 1920s was regularly partisan and frequently scandalous. The *Star's* arguably socialist tendencies may not have been the norm, but their partisanship was. Both the *Tribune* and *Journal* were solidly Republican papers, and they represented the best practices in local news. Political corruption, bootlegging, prostitution, gambling, racism, and anti-Semitism simultaneously supported and provided fodder for scandal sheets that rose to prominence in the 1920s and 30s. The city's media relations reached an all-time low with the murder of two newspaper editors during this decade.⁵

Through newspaper consolidation, journalistic ethics, and sound business practices the Cowles family reversed this disturbing trend in an extremely rapid manner, consolidating Minneapolis' three largest newspapers in less than six years. Their leadership was recognized nationally. Between 1939 and 1968, *Star* (as the *Journal* was then known after its merger) and *Tribune* employees won 1,500 awards, to include four Pulitzer prizes, under the new leadership of the

³ "History of the Journal," *Minneapolis Journal*, November 26, 1903, 2-3; Unnamed article, *Hennepin County History*, Winter 1968, 21-22, Minneapolis Collection, Special Collections, Hennepin County Library; Minneapolis Tribune, *The Story of the Tribune: 1867-1939* (Minneapolis: Minneapolis Tribune, 1939) 9-14.

⁴ Bradley L. Morrison, *Sunlight on Your Doorstep: The Minneapolis Tribune's First Hundred Years, 1867-1967* (Minneapolis: Ross & Haines, 1966) 71; "Cowles Media Company Operations and Their Websites," *Minneapolis Star Tribune*, November 13, 1997 [<http://www.startribune.com/business/11204511.html>] accessed 30 October 2013.

⁵ Bradley L. Morrison, *Sunlight on Your Doorstep: The Minneapolis Tribune's First Hundred Years, 1867-1967* (Minneapolis: Ross & Haines, 1966) 65; "Details of New Minneapolis Star and Tribune Building," *Editor and Publisher*, June 4, 1949, 3-4; Joseph Stipanovich, *City of Lakes: An Illustrated History of Minneapolis* (Minneapolis: Windsor Publications, 1982) 29-30.

Cowles family. *Time* magazine even named the *Tribune* one of the nation's top ten daily newspapers in 1964.⁶

The Cowles' transformation of the *Star's* physical plant was no less dramatic. In 1939 and 1940 the Cowles commissioned Larson and McLaren to redesign the building and nearly double its size with a major rear addition. The facility's technological superiority to those of the *Journal* and *Tribune* helped attract former staff rivals and facilitate the mergers of these news organizations. A series of additions between 1946 and 1948 doubled the physical plant in size once again, incorporating new technologies, a staff cafeteria, a 1,000 square foot first-aid medical center, and a 4,400 square foot rooftop deck. Family medical benefits, stock incentives, pensions, and other progressive Cowles' initiatives matched the family's outlook on civic life.⁷

More than any other member of the family, John Cowles' son, John Jr., brought tremendous civic engagement to his various positions with Cowles Media Company. He was instrumental in attracting the Guthrie Theater to Minneapolis and bringing the Metrodome to Downtown East. He served as director of the Associated Press and donated \$1,000,000 to establish the Cowles Conservatory in the Walker Sculpture Garden. The Cowles family sold the *Star Tribune* to the McClatchy Company in 1998, but the family's philanthropy continues, most recently in 2012, with significant donations helping to restore the historic Shubert Theater and transform it into what is now named the Cowles Dance Center. Staff has, however, received a letter from John Cowles III in support of the applicant's request to demolish the building.⁸

Criterion 3. The property contains or is associated with distinctive elements of city or neighborhood identity.

The property does not appear to be associated with distinctive elements of city or neighborhood identity.

Downtown East is best known as the home of the west bank milling district, the epicenter of Minnesota's lumber milling and flour milling industries, but these uses left the neighborhood long ago. As tree supplies dwindled, lumber milling went into a decline after 1899, with all Minneapolis mills closed by 1920. Flour milling followed suit, at a slightly slower pace. In 1929 Buffalo began producing more flour than Minneapolis, thanks to their proximity to Canadian wheat producers. Even the Washburn-Crosby Company's A Mill, which outlasted all other mills in the district, closed nearly fifty years ago in 1965. But this structure and other evidence of the neighborhood's milling heritage, like North Star Lofts (formerly the North Star Woolen Mill) remain.⁹

⁶ Bradley L. Morrison, *Sunlight on Your Doorstep: The Minneapolis Tribune's First Hundred Years, 1867-1967* (Minneapolis: Ross & Haines, 1966) 55-62; Unnamed article, *Hennepin County History*, Winter 1968, 24, Minneapolis Collection, Special Collections, Hennepin County Library.

⁷ "Details of New Minneapolis Star and Tribune Building," *Editor and Publisher*, June 4, 1949, 5.

⁸ "Publisher John Cowles, Jr. Shaped the Twin Cities for 50 Years," *Minneapolis Star Tribune*, March 19, 2012 [www.startribune.com/printarticle/?id=43100356] accessed October 29, 2013.

⁹ Joseph Stipanovich, *City of Lakes: An Illustrated History of Minneapolis* (Minneapolis: Windsor Publications, 1982) 30.

The *Star Tribune* building is not emblematic of this heritage. The building is an oddity, being a newspaper building located outside of “newspaper row:” the area traditionally associated with print media in Minneapolis. This line of established newspaper outlets ran along 4th Street from 1st Avenue North to Marquette Avenue where the *Star* was established in 1920. The building was constructed in the last decade of the city’s milling preeminence, and the form of the current building, dramatically modified since 1920, dates to the 1960s, when west bank milling ceased.¹⁰

Criterion 4. The property embodies the distinctive characteristics of an architectural or engineering type or style, or method of construction.

The *Star Tribune* building’s design is the result of a series of major renovations beginning in 1939 and 1940, when the newspapers’ twenty-year old red brick Commercial style building was doubled in size and refaced in brick and stone. A series of additions later that decade doubled the structure yet again. Additions to the footprint of the building continued until 1966. During this entire time period architects Larson and McLaren redesigned the building with some Art Deco elements, such as geometric motifs that extend to all four sides of the building. But other traditional Art Deco elements, like smooth faced walls and projections above their parapets, are absent from this example, apart from one asymmetrical, five-story segment on the front façade. The boxy form of the building and the realistic high-relief sculpture is more emblematic of a mid-century modern aesthetic, and understandably so. The Art Deco style was going out of fashion by 1940, and this building represents more of a commitment to extending a particular aesthetic throughout a series of additions rather than embodying the distinctive characteristics of an architectural or engineering type or style, or method of construction.¹¹

Criterion 5. The property exemplifies a landscape design or development pattern distinguished by innovation, rarity, uniqueness or quality of design or detail.

The property does not exemplify a landscape design or development pattern distinguished by innovation, rarity, uniqueness or quality of design or detail. Landscaping on the lot is limited to three parking lot shade trees at the eastern end of the block, and none of them date back to the 1960s.

Criterion 6. The property exemplifies works of master builders, engineers, designers, artists, craftsmen or architects.

The property does not exemplify works of master builders, engineers, designers, artists, craftsmen or architects. Architect Oscar Newstrom’s original, four-story Commercial style building has been too altered by changes from 1939-1966 for the current building to be considered emblematic of his work. Architects Albert Larson and Donald McLaren, who orchestrated the building’s extreme makeover conducted between 1939 and 1966, are clearly master architects, but their work is limited to additions to the building. Better remaining examples of their work, such as the Minnesota State School for Dependent and Neglected

¹⁰ A.J. Russell, *Good-Bye Newspaper Row* (Excelsior, Minnesota, 1943) i.

¹¹ “Details of New Minneapolis Star and Tribune Building,” *Editor and Publisher*, June 4, 1949, 5, 10.

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Children, the Albert Lea Commercial Historic District, and Bismarck, North Dakota's Brandt House, are already listed in the National Register of Historic Places. Locally, the Baker Building (constructed from 1925-1927) and Groveland Apartments (built in 1929), both of which they designed from the beginning, better represent their skills as master architects.¹²

Criterion 7. The property has yielded, or may be likely to yield, information important in prehistory or history.

The subject property has not yielded information important in prehistory or history. Records available at the Minnesota State Historic Preservation Office indicate that no archaeological sites have been identified on the subject property nor have any archaeological surveys been conducted on or near the property in question.

The subject property does not appear likely to yield information important in prehistory. The property lies over one thousand feet from the closest known prehistoric water source, the Mississippi River. Sites not in close proximity (generally five hundred feet or less) to bodies of water have a lower than average potential to include archaeological evidence of precontact human habitation, since bodies of water generally serve as sources of water, food, and transportation.

The subject property does not appear likely to yield information important in history. Sanborn Fire Insurance Maps indicate that this was a developed block by the 1880s. These records indicate the gradual conversion of the street from residential to commercial uses from before 1885 to sometime between 1925 and 1951. The lot in question may contain physical evidence of one or more demolished residential buildings and a stable on the eastern and northern sides of the block. The remainder of the block has a very low likelihood of containing subsurface resources, since the construction of the building's basement and below-grade foundation likely involved the removal of fill containing those resources. Other archaeological sources of information such as sheet refuse (general surface trash scatters that accumulate over time), trash pits, and builder's trenches may still be present below the parking areas. Still, similar situations on surrounding blocks like the McClellan block (bounded by South 3rd Street, South 4th Street, Park Avenue, and Chicago Avenue), which has far less area impacted by buildings with basements, were not deemed likely to contain information important in history or prehistory in the environmental impact statement prepared for the Viking's stadium.¹³

INTEGRITY

The subject property retains its ability to communicate its historical associations with the *Star Tribune* newspaper and the Cowles family. Extensive changes to the building conducted between 1939 and 1966

¹² City of Minneapolis Building Permit #A17425, 700-712 2nd Avenue South; Alan K. Lathrop, *Minnesota Architects: A Biographical Dictionary* (Minneapolis: University of Minnesota Press, 2010)137, 156-157.

¹³ Minnesota Sports Facilities Authority, "Minnesota Multi-Purpose Stadium Environmental Impact Stadium," 3-104 [<http://www.msfa.com/content/ENVIRONMENTAL%20IMPACT%20FINAL%20STATEMENT/Chapter%203%20merged%20with%20figures.pdf>], accessed 10 October 2013.

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have eliminated the building's ability to communicate its historical associations with the Nonpartisan League and with architect Oscar Newstrom, however.

Location: The building remains in its original location, though a series of additions have exponentially increased its original footprint to encompass the entire block.

Design: The building's design has been only minimally altered since 1966, the date of the last sizeable addition to the building's footprint, nearly fifty years ago. This last addition occurred at the rear of the property and is quite difficult to distinguish from earlier additions. Extensive changes to the building conducted between 1939 and 1966 have eliminated the building's ability to communicate its historical associations with the Nonpartisan League and with architect Oscar Newstrom, however.

Setting: The property's integrity of setting remains intact. The building continues to operate adjacent to public and private commercial and institutional structures, as it has done throughout its history.

Materials: The building retains the majority of the exterior materials installed in a series of remodels from 1940-1966.

Workmanship: Integrity of workmanship is especially evident in stone carved in high-relief on the front of the building and geometric patterns near the top of walls on all four sides of the building.

Feeling: The building continues to appear and serve as a newspaper publishing facility. Other buildings associated with the Star Tribune exist, however, and the applicant has indicated that the *Star Tribune* will be vacating this building, currently only half-occupied, in the near future.

Association: The building continues to be associated with the *Star Tribune* newspaper whose staff occupy the building and whose name remains emblazoned upon the front of the building. Other buildings associated with the Star Tribune exist, however, and the applicant has indicated that the *Star Tribune* will be vacating this building, currently only half-occupied, in the near future.

ECONOMIC VALUE OR USEFULNESS OF THE EXISTING STRUCTURE

The Applicant has not demonstrated that the building in question has no economic value or usefulness, but retention of the building is not possible if the land is to be reused as a park, as proposed.

PUBLIC COMMENT

John Cowles III submitted a letter in support of the applicant's request to demolish the subject property.

FINDINGS

1. The property appears to meet two of the significance criteria listed in section 599.210, thus the property appears to meet the definition of a historic resource.

2. The subject property retains its ability to communicate its historical associations with the *Star Tribune* newspaper and the Cowles family. Other buildings associated with the *Star Tribune* exist, however, and the applicant has indicated that the *Star Tribune* will be vacating this building, currently only half-occupied, in the near future. Extensive changes to the building conducted between 1939 and 1966 have eliminated the building's ability to communicate its historical associations with the Nonpartisan League and with architect Oscar Newstrom.
3. The demolition of the subject property is not necessary to correct an unsafe or dangerous condition, but significant amounts of asbestos are present within the building.
4. Reasonable alternatives to demolition exist, but the applicant wishes to use the entire block as a park: a major public amenity for the neighborhood and city at large. The building's retention is not possible with that use, since it occupies the vast majority of the block.
5. The applicant has not demonstrated that the building in question has no economic value or usefulness, but the applicant wishes to use the entire block as a park, and the building's retention is not compatible with that use.
6. The current owner and taxpayer, the subjects of the property's historical significance, are the Cowles Media Company and the *Star Tribune*. They were the parties instrumental in bringing the Metrodome to the neighborhood. They no longer wish to maintain the building. They have entered into an agreement with the applicant to demolish the subject property and redevelop the entire block as a public park. This space is intended to serve as an amenity to not only the neighborhood but also the stadium soon to succeed the Metrodome.
7. The commission may delay a final decision for up to 180 days to allow parties interested in preserving the historic resource a reasonable opportunity to act to protect it.

CPED RECOMMENDATION

CPED recommends that the Heritage Preservation Commission adopt staff findings and **approve** the demolition of the property at 425 Portland Avenue subject to the following conditions:

1. Mitigate for the loss of the building:
 - a. At the developer's expense, the developer shall ensure the six stone medallions are safely removed, stored, and incorporated into the proposed park onsite, along with an interpretive plaque describing the history of the site.
 - b. The developer shall commission a historian who meets the Secretary of the Interior's Professional Qualification Standards in History to document the history of the *Star Tribune* and its previously purchased newspapers, for distribution to CPED and local historical organizations, and possible publication in popular and/or scholarly journals.

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Attachments:

1. Vicinity map
2. Applicant's plans, photos, and analysis
3. Staff photos
4. Public comment